

EXHIBIT B

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
ST. LOUIS DIVISION

RONALD LEES, on behalf of Himself and
other similarly situated,

Plaintiffs,

v.

ANTHEM INSURANCE COMPANIES INC.,
d/b/a ANTHEM BLUE CROSS BLUE
SHIELD,

Defendant.

Case No. 4:3-cv-01411-SNLJ

**DECLARATION OF PHIL COOPER
RE: NOTICE PROCEDURES**

I, **Phil Cooper**, declare:

1. I am a Senior Consultant at Kurtzman Carson Consultants LLC ("KCC"), located at 75 Rowland Way, Suite 250, Novato, California. I am over 21 years of age and am not a party to this action. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

2. The purpose of this declaration is to provide the Parties and the Court with a summary and the results of the work performed by KCC related to the Notice Procedures for the *Lees v. Anthem Insurance Companies* settlement following the Preliminary Approval.

3. KCC was retained to, among other tasks, mail the Postcard Notice (the "Notice"), to purchase and facilitate internet banner notices (the "Publication Notice"), and to complete the CAFA notification. Copies of the Notice and CAFA notification are attached hereto as Exhibits A and B

1 respectively.

2 4. On October 6, 2014, in compliance with the Class Action Fairness Act ("CAFA"), 28
3 U.S.C. Section 1715, KCC mailed a cover letter to the U.S. Attorney General and the Attorneys General
4 for the 55 affected U.S. states and territories. Included with the mailing was a CD-ROM containing the
5 relevant documents for this case, which are detailed and itemized in the cover letter. Copies of the cover
6 letter and the mailing list for the CAFA notice are attached hereto as Exhibit C.

7 5. On October 1, 2014, KCC received from counsel for Defendant computerized lists
8 containing 830,953 unique cellular telephone numbers. Subsequently, on October 20, 2014 and October
9 28, 2014 we received additional files containing supplementary names and addresses. After
10 consolidating the files, performing reverse phone lookups for missing addresses where possible, and
11 accounting for duplicates, unmailable addresses, and multiple names and address associated with
12 individual phone numbers, 1,029,790 records remained on the final Class Member List for direct
13 noticing purposes.

14 6. On or before November 11, 2014, KCC caused the addresses in the Class Member List to
15 be updated using the National Change of Address system, which updates addresses for all people who
16 had moved during the previous four years and filed a change of address with the U.S. Postal Service.
17 New addresses were found for 182,253 class members. The Class Member List was updated with these
18 new addresses.

19 7. On or before November 12, 2014, KCC caused an Interactive Voice Response (the
20 "IVR") system to be established (888-992-0009) to provide information about the settlement and to
21 record requests for Notice Packets.

22 8. On or before November 12, 2014, KCC caused a website to be established
23 (www.anthemtcpasettlement.com) to provide information about the settlement, post court documents
24 relating to the settlement, allow Class Members to submit claims electronically and download copies of
25 the Claim Form and Notice.

26 9. On or before November 12, 2014, KCC caused the Notice to be printed on a double-sided
27 postcard and mailed by First Class mail to the 1,029,790 names and address on the Class Member List.

28 10. To supplement the direct notice efforts, KCC produced and placed internet banner ads on

1 Xaxis Premium Network (XPN) and Bankrate.com. The XPN internet banners were behaviorally
2 targeted (*i.e.* data and analytics were used to tailor the digital ads based on consumers online behavior)
3 to reach adults who were searching for health insurance information because these individuals are more
4 likely to be Class Members in this case. A total of 6.75 million unique internet impressions were
5 purchased on this platform. These internet banners ran from November 16, 2014 through November 23,
6 2014 and, when completed, delivered an extra 18,226 impressions at no charge. Bankrate.com was
7 selected as another method to deliver internet impressions because people who visit it are those
8 searching for health insurance, mortgage, credit card, bank, auto insurance, investment, tax, retirement
9 and financial planning information. Bankrate.com offers original, objective content that covers major
10 personal finance topics. Their weekly offering includes over 50 editorial features, 14 advice columns, 13
11 blogs, 7 rate trend analyses, and over 155 new pieces. In addition, Bankrate.com receives over 13
12 million unique visitors every month. In general their visitors are upscale, educated and affluent, web-
13 savvy, take-charge, self-directed consumers who are comfortable researching and transacting financial
14 products online. A total of 2.75 million unique internet impressions were purchased on this platform.
15 These internet banners ran from November 16, 2014 through December 12, 2014 and, when completed,
16 delivered an extra 10,374 impressions at no charge.

17 11. In an effort to further enhance coverage and boost response, KCC produced and placed
18 supplemental internet banner ads on XPN and Bankrate.com. The supplemental internet banners
19 provided a call to action by reminding potential Class Members to file a claim before the January 11,
20 2015 deadline. These supplemental internet banners appeared on XPN from December 22, 2014 through
21 January 11, 2015. A total of 6.75 million internet banners were purchased. Upon completion, 6,753,360
22 were delivered; providing 3,360 more impressions than planned at no charge. Supplemental internet
23 banners also appeared on Bankrate.com from December 23, 2014 through January 11, 2015. A total of
24 2.75 million internet banners were purchased. Upon completion, 2,763,027 were delivered; providing
25 3,027 more impressions than planned at no charge. Samples of both sets of internet banners are shown in
26 Exhibit C attached hereto.

27 12. As of the date of this declaration, 3,683 Notice Packets were returned to KCC by the U.S.
28 Postal Service with forwarding addresses. KCC caused the Class Member List to be updated with the

1 new addresses and Notice Packets to be re-mailed to the Class Members at each of these new addresses.

2 13. As of the date of this declaration, 162,140 Notices were returned to KCC by the U.S.
3 Postal Service without forwarding addresses. Of those, 89,284 Notices were re-mailed after new
4 addresses were found through address searches. In total, after all search and re-mail attempts, 56,730
5 records have no deliverable address. Based on our calculations, the individual notice effort reached
6 approximately 94.5% of the Class.

7 14. As of the date of this declaration, 8,841 calls have been received by the IVR. Of these
8 callers, 4,602 requested a Notice Packet. All Notice Packet requests have been fulfilled.

9 15. As of the date of this declaration, KCC has received 22 Requests for Exclusion. A list of
10 the individuals requesting exclusion and copies of the exclusion requests are attached hereto as Exhibit
11 D.

12 16. As of the date of this declaration, KCC has received one objection to the Settlement.

13 17. As of the date of this declaration, 11,703 Claim Forms have been filed by Class
14 Members. Of the Claim Forms 9,166 were submitted through the website directly. Of the 11,703 Claim
15 Forms:

- 16 a. 8,139 have been determined to be valid claims;
- 17 b. 319 were deemed invalid because they were submitted after the claims filing
18 deadline. Further review indicated 233 of these would be otherwise valid if they
19 had been submitted timely.
- 20 c. 13 were deemed invalid because they did not sign their Claim Form. Further
21 review indicated that all 13 would be otherwise valid if they had signed their
22 Claim Form.
- 23 d. 2 were deemed invalid because they did not provide a cellular number on their
24 Claim Form at all.
- 25 e. 2,712 were deemed invalid because they provided a cellular number on their
26 claim form that did not match the class list; and
- 27 f. 518 have been identified as duplicative of other Claim Form received.


28 18. As of the date of this declaration, KCC has estimated the total cost of administration

1 through completion to be \$975,384.

2 19. According to our calculations, the individual notice effort alone reached approximately
3 94.5% of the Class. The initial and supplemental internet banner notices served to further enhance
4 coverage and increase the number of opportunities for Class Members to be exposed to the Notice.

5 20. According to the Federal Judicial Center's 2010 *Judges' Class Action Notice and Claims*
6 *Process Checklist and Plain Language Guide*¹, "A high percentage (e.g., between 70–95%) can often
7 reasonably be reached by a notice campaign." As illustrated above, the upper end of that range has been
8 achieved in this case.

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10
11 I declare under penalty of perjury pursuant to the laws of the State of California that the foregoing is true
12 and correct to the best of my knowledge and that this declaration was executed this 26th day of March
13 2015 at Novato, California.

14
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16 Phil Cooper

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¹ [http://www.fjc.gov/public/pdf.nsf/lookup/NotCheck.pdf/\\$file/NotCheck.pdf](http://www.fjc.gov/public/pdf.nsf/lookup/NotCheck.pdf/$file/NotCheck.pdf)

EXHIBIT A

***Lees v. Anthem Insurance Companies* Claims Administrator**

P.O. Box 43316

Providence, RI 02940-3316

«Barcode»

Postal Service: Please do not mark barcode

Claim#: ANL-«ClaimID» - «MailRec»

«First1» «Last1»

«CO»

«Addr2»

«Addr1»

«City», «St» «Zip»

«Country»

ANL

If you were contacted by "Anthem Blue Cross and Blue Shield," or its affiliated companies ("Anthem") on the cellular phone number assigned to you without your consent between July 15, 2009 and July 16, 2014, you could receive money from a class action Settlement.

This Court-Authorized notice describes your rights and gives information about the proposed Settlement in *Lees v. Anthem Insurance Companies, Inc.*, Case No. 4:13-cv-01411 (E.D.Mo.)

Summary

Ronald Lees filed this class action lawsuit in the federal court located in St. Louis alleging that Anthem used automated telephone dialing equipment to call cellular phone numbers of persons who had not consented to receive such calls, in violation of the Telephone Consumer Protection Act, 47 U.S.C. § 227. Anthem expressly denies these allegations or that it did anything wrong. Anthem asserts that it is its practice to only call cellular numbers assigned to persons who consented to the calls by submitting requests via the Internet for information about, or quotes for, health insurance. You received this notice because potentially your cellular phone number was one that Alta Resources, Inc., a call center vendor, called on Anthem's behalf on or after July 15, 2009.

To avoid the expense and risks associated with trial, the parties have agreed to settle the case. Depending upon how many Class Members submit valid claim forms, Anthem will pay between \$4.75 million and \$6.25 million to settle this case (the "Settlement Fund"), which will be distributed pro rata to persons submitting valid claims after deducting payments for attorney fees and costs, Notice and Claims Administration expenses and a named plaintiff incentive award.

Given the number of likely valid claims, it is estimated that proper claimants will receive approximately \$36 per uniquely assigned cellular phone number called to that claimant. If you received a call from Anthem to your assigned cellular number without your consent and wish to receive a distribution from the Settlement Fund, please submit a valid claim using the form found on the settlement website www.AnthemTCPASettlement.com or obtained from the Claims Administrator. Additional information, including the settlement agreement itself, is also available at www.AnthemTCPASettlement.com. Class counsel will apply to the Court for a payment from the Settlement Fund for their fees and costs (equal to 1/3 of the total potential recovery), an additional amount for Notice and Claims Administration expenses and an incentive award for the named plaintiff, Mr. Lees.

YOUR RIGHTS AND OPTIONS (INCLUDING DEADLINES)

Please submit a valid claim if you wish to participate. To receive a Settlement Award from the Settlement Fund, Settlement Class Members must mail a valid and timely claim form to the Claims Administrator, who will verify your claim. You can obtain a claim form from www.AnthemTCPASettlement.com or by calling 1-888-992-0009 and requesting that a claim form be mailed to you. If you have any questions about properly filing a claim form, contact the Claims Administrator at 1-888-992-0009. **All claim forms must be postmarked by January 11, 2015.** If you do not send in a valid claim form, you will not receive any monetary benefit from this Settlement.

If you do **NOT** want to participate in the Settlement, you may exclude yourself by submitting a written request postmarked by December 27, 2014. Details and additional requirements regarding exclusions are available at www.AnthemTCPASettlement.com. If you were to exclude yourself and file your own case to pursue these claims, you would receive nothing from this Settlement, but would retain the right to file your own lawsuit against Anthem at your own cost. If you do not exclude yourself, you will be bound by the terms of the Settlement and give up your right to sue regarding the settled claims.

If you are a Settlement Class Member, and have not excluded yourself from the Settlement, you can object to any aspect of the Settlement. Written objections must be filed with the Court and sent to Counsel postmarked by December 27, 2014. Details and additional requirements regarding exclusions and objections are available at www.AnthemTCPASettlement.com. Anyone who objects to the Settlement may ask to appear at the Fairness Hearing.

The Court has set the Fairness Hearing for April 1, 2015 at 1:30 p.m., at the United States District Court for the Eastern District of Missouri, St. Louis Division located at 111 South 10th Street, St. Louis, MO 63102.

This notice is only a summary. Complete details about your rights and options are available at www.AnthemTCPASettlement.com or by contacting the Claims Administrator at 1-888-992-0009. **Do not call the Court.**

¹ Companies affiliated with Anthem include companies doing business as Blue Cross/Blue Shield of Georgia, Empire Blue Cross/Blue Shield and Blue Cross of California.

EXHIBIT B



David Z. Smith
Direct Phone: +1 312 207 6476
Email: dzsmith@reedsmith.com

10 South Wacker Drive
Chicago, IL 60606-7507
Tel +1 312 207 1000
Fax +1 312 207 6400
reedsmith.com

October 6, 2014

VIA PRIORITY MAIL

«First» «Last»
«Company»
«Address_1»
«Address_2»
«City», «State» «Zip»

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear «First» «Last»:

REED SMITH LLP represents Anthem Insurance Companies Inc. (“Anthem”) in a putative class action lawsuit entitled *Ronald Lees, et al., v. Anthem Insurance Companies Inc., d/b/a/ Anthem Blue Cross Blue Shield*, Case No. 4:13-cv-01411-SNLJ. The lawsuit is pending before the Honorable Stephen N. Limbaugh, Jr., in the United States District Court for the Eastern District of Missouri, St. Louis Division. This letter is to advise you that Plaintiff filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit on September 26, 2014.

Case Name: *Ronald Lees, et al., v. Anthem Insurance Companies Inc., d/b/a Anthem Blue Cross Blue Shield*

Case Number: 4:13-cv-01411-SNLJ

Jurisdiction: United States District Court,
Eastern District of Missouri, St. Louis Division

Date Settlement
Filed with Court: September 26, 2014

Defendant denies any wrongdoing or liability whatsoever, but has decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation. In compliance with 28 U.S.C. § 1715(b), the following documents referenced below are included on the CD that is enclosed with this letter:

1. **28 U.S.C. § 1715(b)(1) – Complaint and Related Materials:** Copies of the *Complaint - Class Action* and *Defendants Answer and Affirmative Defenses* are included on the enclosed CD Rom.

«First» «Last»
October 6, 2014
Page 2

2. **28 U.S.C. § 1715(b)(2) – Notice of Any Scheduled Judicial Hearing:** As of October 6, 2014, the Court in its Preliminary Approval Order, has scheduled a final fairness hearing in this matter to take place on April 1, 2015, at 1:30 p.m. before the Honorable Stephen N. Limbaugh, Jr. A copy of the Court's *Preliminary Approval Order*, entered on September 29, 2014, is included on the enclosed CD Rom.
3. **28 U.S.C. § 1715(b)(3) – Notification to Class Members:** Copies of the *Claim Form*, *Mail Notice*, *Publication Notice*, and *Website Notice* to be provided to the class is included on the enclosed CD Rom.
4. **28 U.S.C. § 1715(b)(4) – Class Action Settlement Agreement:** A copy of the *Settlement Agreement and Release* (with accompanying Exhibits) is included on the enclosed CD Rom.
5. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreement:** As of October 6, 2014, no other settlement or agreement has been entered into by the parties to this Action.
6. **28 U.S.C. § 1715(b)(6) – Final Judgment:** No Final Judgment has been reached as of October 6, 2014, nor have any Notices of Dismissal been granted at this time.
7. **28 U.S.C. § 1715(b)(7)(A)-(B) – Names of Class Members/Estimate of Class Members:** Pursuant to 28 U.S.C. § 1715(b)(7)(A)-(B), at this time a complete list of names of class members as well as each State of residence is not available, because other than the named plaintiff, class members, as a whole, are known by their cellular telephone numbers. Anthem only has limited records of addresses corresponding to only some of the approximately 830,000 cellular telephones at issue, and that information is not necessarily current. Because cellular telephone numbers are portable, there is not always a correlation between the area code of a cellular telephone and the phone owner's state of residence. Based upon the limited address information and using the area codes of the cellular telephone numbers, a table showing the approximated States of residence of the class by percentage is attached to this letter as Exhibit A. Nonetheless, under the proposed settlement, class members are treated equally in the determination of each class member's respective entitlement to relief, regardless of where they live.
8. **28 U.S.C. § 1715(b)(8) – Judicial Opinions Related to the Settlement:** As the proposed Settlement is still pending final approval by the Court, other than the Preliminary Approval Order, there are no other opinions available at this time. A copy of the Preliminary Approval Order, entered on September 29, 2014, is included on the enclosed CD Rom.

ReedSmith

«First» «Last»
October 6, 2014
Page 3

If for any reason you believe the enclosed information does not fully comply with 28 U.S.C. § 1715, please contact REED SMITH LLP immediately so that Anthem can address any concerns or questions you may have.

Thank you.

Sincerely,

/s/
David Z. Smith
REED SMITH LLP

Attachment
Enclosure – CD Rom October 2, 2014

Attachment A

Last	First	Company	Address 1	Address 2	City	State	Zip
Geraghty	Michael	Office of the Alaska Attorney General	P.O. Box 110300		Juneau	AK	99811-0300
Strange	Luther	Office of the Alabama Attorney General	501 Washington Avenue	PO Box 300152	Montgomery	AL	36130-0152
McDaniel	Dustin	Arkansas Attorney General Office	323 Center Street, Suite 200		Little Rock	AR	72201-2610
Horne	Tom	Office of the Arizona Attorney General	1275 W. Washington Street		Phoenix	AZ	85007
	CAFA Coordinator	Office of the Attorney General	Consumer Law Section	455 Golden Gate Ave., Suite 11000	San Francisco	CA	94102
Suthers	John	Office of the Colorado Attorney General	Ralph L. Carr Colorado Judicial Center	1300 Broadway, 10th Floor	Denver	CO	80203
Jepsen	George	State of Connecticut Attorney General's Office	55 Elm Street		Hartford	CT	6106
Nathan	Irvin	District of Columbia Attorney General	441 4th Street, NW, Suite 1100S		Washington	DC	20001
Holder, Jr.	Eric H.	Attorney General of the United States	United States Department of Justice	950 Pennsylvania Avenue, NW	Washington	DC	20530-0001
Biden III	Joseph R.	Delaware Attorney General	Carvel State Office Building	820 N. French Street	Wilmington	DE	19801
Bondi	Pam	Office of the Attorney General of Florida	The Capitol, PL-01		Tallahassee	FL	32399-1050
Olens	Sam	Office of the Georgia Attorney General	40 Capitol Square, SW		Atlanta	GA	30334-1300
Louie	David	Office of the Hawaii Attorney General	425 Queen Street		Honolulu	HI	96813
Miller	Tom	Iowa Attorney General	Hoover State Office Building	1305 E. Walnut Street	Des Moines	IA	50319
Wasden	Lawrence	State of Idaho Attorney General's Office	Statehouse	700 W Jefferson St	Boise	ID	83720-0010
Madigan	Lisa	Illinois Attorney General	James R. Thompson Center	100 W. Randolph Street	Chicago	IL	60601
Zoeller	Greg	Indiana Attorney General's Office	Indiana Government Center South	302 West Washington Street, 5th Floor	Indianapolis	IN	46204
Schmidt	Derek	Kansas Attorney General	120 S.W. 10th Ave., 2nd Floor		Topeka	KS	66612-1597
Conway	Jack	Office of the Kentucky Attorney General	700 Capitol Ave	Capitol Building, Suite 118	Frankfort	KY	40601
Caldwell	James D.	Office of the Louisiana Attorney General	P.O. Box 94095		Baton Rouge	LA	70804-4095
Coakley	Martha	Office of the Attorney General of Massachusetts	1 Ashburton Place		Boston	MA	02108-1518
Gansler	Douglas F.	Office of the Maryland Attorney General	200 St. Paul Place		Baltimore	MD	21202-2202
Mills	Janet	Office of the Maine Attorney General	State House Station 6		Augusta	ME	04333
Schutte	Bill	Office of the Michigan Attorney General	P.O. Box 30212	525 W. Ottawa Street	Lansing	MI	48909-0212
Lori Swanson	Attorney General	Attention: CAFA Coordinator	1400 Bremer Tower	445 Minnesota Street	St. Paul	MN	55101-2131
Koster	Chris	Missouri Attorney General's Office	Supreme Court Building	207 W. High Street	Jefferson City	MO	65101
Hood	Jim	Mississippi Attorney General's Office	Department of Justice	P.O. Box 220	Jackson	MS	39205
Fox	Tim	Office of the Montana Attorney General	Justice Bldg.	215 N. Sanders Street	Helena	MT	59620-1401
Cooper	Roy	Office of the North Carolina Attorney General	Department of Justice	P.O. Box 629	Raleigh	NC	27602-0629
Stenehjem	Wayne	North Dakota Office of the Attorney General	State Capitol	600 E. Boulevard Avenue	Bismarck	ND	58505-0040
Bruning	Jon	Office of the Nebraska Attorney General	State Capitol	P.O. Box 98920	Lincoln	NE	68509-8920
Delaney	Michael	New Hampshire Attorney General	State House Annex	33 Capitol Street	Concord	NH	03301-6397
Chiesa	Jeffrey S.	Office of the New Jersey Attorney General	Richard J. Hughes Justice Complex	25 Market Street, P.O. Box 080	Trenton	NJ	08625
King	Gary	Office of the New Mexico Attorney General	P.O. Drawer 1508		Santa Fe	NM	87504-1508
Masto	Catherine Cortez	Nevada Attorney General	Old Supreme Ct. Bldg.	100 North Carson Street	Carson City	NV	89701
Schneiderman	Eric	Office of the New York Attorney General	Department of Law	The Capitol, 2nd Floor	Albany	NY	12224
Dewine	Mike	Ohio Attorney General	State Office Tower	30 E. Broad Street	Columbus	OH	43266-0410
Pruitt	Scott	Oklahoma Office of the Attorney General	313 NE 21st Street		Oklahoma City	OK	73105
Rosenblum	Ellen F.	Office of the Oregon Attorney General	Justice Building	1162 Court Street, NE	Salem	OR	97301
Kane	Kathleen	Pennsylvania Office of the Attorney General	1600 Strawberry Square		Harrisburg	PA	17120
Kilmartin	Peter	Rhode Island Office of the Attorney General	150 South Main Street		Providence	RI	02903
Wilson	Alan	South Carolina Attorney General	Rembert C. Dennis Office Bldg.	P.O. Box 11549	Columbia	SC	29211-1549
Jackley	Marty J.	South Dakota Office of the Attorney General	1302 East Highway 14, Suite 1		Pierre	SD	57501-8501
Cooper, Jr.	Robert E.	Tennessee Attorney General and Reporter	425 5th Avenue North		Nashville	TN	37243
Abbott	Greg	Attorney General of Texas	Capitol Station	P.O. Box 12548	Austin	TX	78711-2548
Swallow	John	Utah Office of the Attorney General	State Capitol, Room 236	305 N State St	Salt Lake City	UT	84114-0810
Cuccinelli	Ken	Office of the Virginia Attorney General	900 East Main Street		Richmond	VA	23219
Sorrell	William H.	Office of the Attorney General of Vermont	109 State Street		Montpelier	VT	05609-1001
Ferguson	Bob	Washington State Office of the Attorney General	1125 Washington St SE	P.O. Box 40100	Olympia	WA	98504-0100
Van Hollen	J.B.	Office of the Wisconsin Attorney General	Dept of Justice, State Capitol, RM 114	East P.O. Box 7857	Madison	WI	53707-7857
Morrissey	Patrick	West Virginia Attorney General	State Capitol	1900 Kanawha Blvd E	Charleston	WV	25305
Phillips	Gregory	Office of the Wyoming Attorney General	State Capitol Bldg.	200 W 24th St	Cheyenne	WY	82002
Lutu	Aloa Leulumoega	American Samoa Attorney General	Exec. Ofc. Bldg, Utulei	Territory of American Samoa	Pago Pago	AS	96799
Rapadas	Leonardo M	Attorney General Office	590 S. Marine Corps Drive	ITC Bldg, Suite 706	Tamuning	Guam	96913
San Nicolas	Joey Patrick	Northern Mariana Islands Attorney General	Administration Building	PO Box 10007	Saipan	MP	96950-8907
Miranda-Rodriguez	Cesar R.	Puerto Rico Attorney General	P.O. Box 902192		San Juan	PR	00902-0192
Frazier	Vincent	Department of Justice	Virgin Islands Attorney General	34-38 Kronprindsens Gade, GERS Bldg, 2nd Floor	St. Thomas	VI	00802
Burke	Alexander H.	Burke Law Offices, LLC	155 N. Michigan Avenue	Suite 9020	Chicago	IL	60601
Larry P. Smith	David M. Marco &	Smith Marco, P.C.	205 North Michigan Avenue	Suite 2940	Chicago	IL	60601
Smith	David Z.	Reed Smith LLP	10 South Wacker Drive		Chicago	IL	60606-7507
Passarella	Patrick M.	KCC Class Action Services	75 Rowland Way	Suite 250	Novato	CA	94945
Carameros	Jonathan D.	KCC Class Action Services	75 Rowland Way	Suite 250	Novato	CA	94945

aburke@burkelawllc.com
dmarco@smithmarco.com
dzsmith@reedsmith.com

EXHIBIT C

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MORTGAGES

BANK RATES

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TOP STORY

How to figure out student loan costs
 Use Bankrate's student loan calculator to determine how quickly you'll pay off your college loans. [Read more](#)

- Can adults use 529 plan funds?
- Best gift ideas for babies' college savings
- Teaching kids to avoid money missteps

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FIND A 529 COLLEGE SAVINGS PLAN

State-sponsored savings plans aren't all alike, and you're not stuck with your state's plans.

State: Florida

FIND A STUDENT LOAN RATE

Borrower is -- at -- College name --

Amount of loan --

Private student loan search by SimpleTuition.com

COLLEGE FINANCE

Use home loan for college costs?

Good news: You have equity in your home. How can you use it for college? [Read more](#)

Money-saving tips for college

Need help paying for college? Try these savvy, nontraditional ways to save money. [Read more](#)

Is prepaid tuition plan best?

Florida now offers a cheaper college savings plan. Is this 529 plan right for you? [Read more](#)

Tips for parents of college kids

An expert offers tips for parents helping their teens with the transition to college life. [Read more](#)

COLLEGE FINANCE BASICS

Education-savings plans

Paying for college is a big burden for families. Here are tax-favored savings plans to help bear the cost.

- College finance timeline
- Pick the right school
- Benefits of bonds

SEARCH FOR A CREDIT CARD BY TYPE:

REWARDS
CASH BACK
0% APR

Compare credit cards that offer cash back up to 5%

CreditCards.com

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COMPARE COLLEGE FINANCE RATIES

Student Loans

Stafford Loan Rate - in school	Alabama	Colorado	Georgia	Iowa
Stafford Loan Rate - after school <td>Alaska</td> <td>Connecticut</td> <td>Hawaii</td> <td>Kansas</td>	Alaska	Connecticut	Hawaii	Kansas
Plus Loan	Arizona	Delaware	Idaho	Kentucky
Private Loan	Arkansas	D.C.	Illinois	Louisiana
30K FICO-based Home Equity Loan	California	Florida	Indiana	More states

Find a 529 plan by state

FRUGAL NEWSLETTER

Discover new ways to cut costs and save more every day. Reduce your spending, not life's pleasures. Delivered weekly.

First Name
 Zip Code

Email

*Your data will not be shared with others and you can unsubscribe at any time.

If you received a sales inquiry call on your cell phone from or on behalf of Anthem Blue Cross/Blue Shield or its affiliated companies without your prior consent, you may be entitled to a cash payment from a class action settlement.

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MONEYTECHTRAVEL



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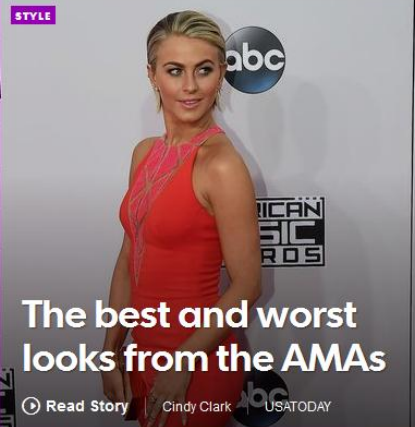
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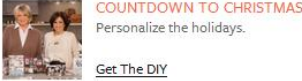





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